

Publisher's directories at no charge." AT&T § 15.1.1; see Brooks Fiber § 18.0. These listings will be interfiled with listings of Ameritech customers, and Ameritech will provide a copy of the requesting carrier's customer listings in a mutually agreed-upon form and format to the requesting carrier prior to publication. In addition to providing listings, Ameritech has agreed to provide initial and secondary delivery of White Pages directories to customers of resellers on the same basis as its own customers. AT&T § 15.2.5. Ameritech will also license its White Pages listings on a current basis to competing carriers for use in publishing directories. Finally, Ameritech provides access to its directory listings in readily accessible magnetic tape or electronic format as required by 47 C.F.R. § 51.217(c)(3)(ii). AT&T Sch. 9.5(8.10, 8.11).

106. Ameritech is currently furnishing White Pages listings to Brooks Fiber, MCI Metro, TCG, MFS and several other carriers.

IX. CHECKLIST ITEM (ix): NUMBERING ADMINISTRATION

107. Checklist Item (ix) requires that Ameritech provide, "[u]ntil the date by which telecommunications numbering administration guidelines, plans, or rules are established, nondiscriminatory access to telephone numbers for assignment to the other carrier's telephone exchange service customers." 47 U.S.C. § 271(c)(2)(B)(ix). The Rules (§ 51.217(e)(i)), in turn, require that a LEC permit competing providers to have access to

telephone numbers that is identical to the access the LEC provides itself. Ameritech meets this requirement.

108. Ameritech provides nondiscriminatory access to telephone numbers for assignment to other carriers' telephone exchange service customers. Brooks Fiber § 14.0; AT&T Art. XIV. Until a new numbering administration is in place, Ameritech is continuing to act as the Central Office Code Administrator in Michigan in accordance with the Central Office Code Assignment Guidelines and the NPA Code Relief Planning Guidelines or their successors under the oversight and complaint jurisdiction of the FCC and MPSC. 47 C.F.R. § 51.217(a)(2). In the meantime, Ameritech continues to support efforts to transfer its number administration responsibilities to a neutral third party.
109. The process for obtaining a central office code (the first three digits of a seven-digit telephone number, usually referred to as an NXX) is identical for Ameritech and all requesting carriers and is relatively simple. First, the code applicant makes a request to the Ameritech Code Administrator using the Central Office Code Assignment Request and Confirmation Form. The administrator date-stamps the request and then determines if the request is in compliance with the national code assignment guidelines. If it is, the administrator then selects an unassigned code for assignment. The administrator honors requests for specific numbers or blocks of numbers if available. The administrator normally will respond to the applicant within 10 working days from receipt of the

application with the assignment. Applications will be denied based upon nondiscriminatory criteria as authorized in the guidelines and orders of the FCC, and where a request is denied, the administrator will provide specific reasons for the denial and information on where to appeal the decision. When the NXX code is assigned, Ameritech or the applicant will input the NPA, NXX and other relevant data into the Routing Data Base System ("RDBS") in order to ensure that the public is aware that the new code is open.

110. Ameritech is currently providing MFS, Brooks Fiber, TCG, MCI Metro and other carriers with nondiscriminatory access to numbers. Since September 30, 1994, Ameritech has used this process to assign 112 NXXs to new local exchange providers. Each NXX can support up to 10,000 different telephone numbers. Thus, if fully utilized, these codes would support over 1.1 million telephone numbers.

**X. CHECKLIST ITEM (x): ACCESS TO CALL-RELATED
DATABASES AND SIGNALING LINKS**

111. Both the Checklist (§ 271(c)(2)(B)(x)) and Rules (§ 51.319(e)) require BOCs to provide nondiscriminatory access to signaling networks and call-related databases. Ameritech's interconnection agreements provide for nondiscriminatory access to its signaling networks and call-related databases used for call routing and completion. Brooks Fiber § 16.0; MFS § 16.0; TCG § 17.0; AT&T Schs. 9.2.7, 9.5(6.1, 6.2).

112. **Signaling Networks.** Ameritech provides nondiscriminatory access to its signaling links and Signal Transfer Points ("STPs") on an unbundled basis. 47 C.F.R. § 51.319(e)(1)(i). Brooks Fiber § 16.0; AT&T Sch. 9.2.5(1.0). These arrangements permit requesting telecommunications carriers to use Ameritech's SS7 signaling network for signaling between their switches, between their switches and Ameritech's switches, and between their switches and the networks of other parties connected to Ameritech's SS7 network. AT&T Sch. 9.2.5(1.0). In all cases, access to Ameritech's SS7 network is provided via a signaling link between other parties' switches and an Ameritech STP in the same manner as Ameritech itself gains comparable access or in any other technically feasible manner requested through the BFR Process. 47 C.F.R. § 51.319(e)(1)(ii)-(iv). AT&T Schs. 9.2.5(1.2), 9.5(6.1).
113. **Call-related databases.** Call-related databases are databases other than operations support systems (OSS) used in signaling networks for the transmission, routing, billing and collection, or other aspects of providing a telecommunications service. These databases include all the call-related databases identified by the FCC in its Rules (47 C.F.R. § 51.319(e)(2)(ii)). Call-related databases provided by Ameritech are the Line Information Database (LIDB) (AT&T Sch. 9.2.5(2.2)), the Toll Free Calling (800) database (id., Sch. 9.2.5(2.1)) and Advanced Intelligent Network (AIN) databases used for call routing and completion. See id., Sch. 9.2.5(2.5). When long-term number

portability is deployed, Ameritech will provide unbundled access to its long-term number portability downstream databases. Id., Sch. 9.2.5(2.4).

114. Under Ameritech's agreements, requesting telecommunications carriers may obtain access to these databases via Ameritech's out-of-band SS7 signaling network in the same manner as Ameritech obtains such access or in any other technically feasible manner. AT&T Sch. 9.5(6.2.2)
115. Ameritech allows any requesting carrier that purchases local switching capability to use Ameritech's service control point ("SCP") in the same manner, and via the same signaling links, as Ameritech. 47 C.F.R. § 51.319(e)(2)(iii). AT&T Sch. 9.5(6.2.2).
116. When a requesting carrier deploys its own switch linked to Ameritech's signaling system, the carrier may obtain access to Ameritech's SCP in a manner enabling the carrier to provide any call-related, database-supported services to customers using its switch. 47 C.F.R. § 51.319(e)(2)(iv). AT&T Sch. 9.2.5.
117. Ameritech provides access to its call-related databases in a manner that complies with § 222 of the Act. 47 C.F.R. § 51.319(e)(2)(vi). AT&T Sch. 9.5(6.2.2).

118. Ameritech currently furnishes Brooks Fiber, MFS, TCG and others with unbundled access to access to both the 800 and LIDB databases. In September of 1996, Ameritech received more than 1.1 million queries to its call-related databases in Michigan.
119. **Service Management Systems.** Ameritech provides access to its Service Management Systems ("SMS") as they are defined in the Rules. 47 C.F.R. § 51.319(e)(3)(A). AT&T Sch. 9.5(6.0). Requesting carriers are provided relevant information necessary to enter correctly, or format for entry, information for input into Ameritech's SMS. 47 C.F.R. § 51.319(e)(3)(B). AT&T Sch. 9.5(6.3.1).
120. The access provided to SMS complies with § 222 of the Act. 47 C.F.R. 51.319(e)(3)(E). AT&T Sch. 9.5(6.3.3).
121. Ameritech enables requesting telecommunications carriers to develop and provide AIN services to those carriers' customers served either by Ameritech's end offices or by the requesting carrier's offices. AT&T Sch. 9.2.5(2.5).
122. AIN service design, creation and testing capabilities are available through Ameritech's provision of access to its SCE. AT&T Schs. 9.2.5(2.5), 9.5(6.3). Deployment of AIN services is available through Ameritech's provision of AIN Applications Access. Id., Sch. 9.2.5(2.5). Ameritech's SMS, SCE and Application Access meet the equal-in-

quality requirement for requesting telecommunications carriers; the access provided to these products is equivalent to the access Ameritech provides to itself or its affiliates.

123. Ameritech will respond to requests for additional arrangements for access to call-related databases and associated signaling facilities through the BFR Process.
124. In summary, as required by 47 C.F.R. § 51.319(e), Ameritech provides unbundled, nondiscriminatory access to its signaling networks; to its call-related databases used in signaling networks for billing and collection or the transmission, routing or other provision of telecommunications service; and to its SMS. Each item is accessed through Ameritech's STPs by a requesting telecommunications carrier in the same manner and via the same signaling links that are used by Ameritech itself.
125. Ameritech is currently furnishing access to call-related databases and signaling to several carriers, including Brooks Fiber, MFS and TCG.

XI. CHECKLIST ITEM (xi): NUMBER PORTABILITY

126. Checklist Item (xi) requires that "[u]ntil the date by which the Commission issues regulations pursuant to section 251 to require number portability," Ameritech and other BOCs must provide "interim telecommunications number portability through remote call forwarding, direct inward dialing trunks, or other comparable arrangements, with as little

impairment of functioning, quality, reliability, and convenience as possible." 47 U.S.C. § 271(c)(2)(B)(xi). Ameritech also must fully comply with regulations issued by the FCC under Section 251. Id. Ameritech meets this requirement.

127. Ameritech provides interim number portability to requesting telecommunications carriers primarily through remote call forwarding ("RCF") or Direct Inward Dialing ("DID") in full compliance with the FCC's Rules. Brooks Fiber §§ 13.1-.3; MFS §§ 13.1-.3; TCG §§ 13.1-.3; AT&T §§ 13.3, 13.4.
128. Interim number portability is being provided as a transitional service until long-term database number portability is deployed in an MSA. As a result, it is important that any interim method of number portability (1) be technically feasible now, (2) be available based upon current facilities, (3) not result in significant additional costs and (4) port numbers with a minimum loss of functionality. As the FCC found in its Telephone Number Portability First Order, CC No. 95-116 ("Portability Order"), RCF or DID meet these criteria, and either one may be deployed to satisfy an incumbent LEC's duty to provide interim number portability.
129. RCF is a capability in switches that automatically forwards calls made to a "ported" 7/10 digit local telephone number assigned to another LEC. Furthermore, additional call paths are available under RCF to accommodate the provision of simultaneous call

completion for such features as call waiting, call forwarding and voice mail by a requesting telecommunications carrier to its end user customers.

130. DID is provided through direct inward dial trunks, which port calls to the dialed number to the requesting telecommunications carrier's switching equipment for identification, subsequent routing and completion, where the service has been transferred to that carrier. Because of the present signaling nature of DID service, it requires direct, dedicated transport facilities from the Ameritech switch, where the ported number resides, to the requesting telecommunications carrier's switch. In order to make the necessary transport facilities available on the most flexible and economic basis, Ameritech has enhanced its existing DID service to permit requesting telecommunications carriers to self-provision the transport via collocation arrangements and has created a more economical DS1 transport service option as well.
131. Ameritech also has agreed to provide interim number portability through NXX Migration (AT&T § 13.5) and to provide other methods, to the extent technically feasible, pursuant to a BFR. AT&T § 13.10.
132. As required by the FCC, Ameritech will recover the costs of providing interim number portability in a competitively neutral manner established by the MPSC. See Brooks Fiber § 13.6; MFS § 13.5; TCG §§ 13.5, 13.7; AT&T § 13.8. In the meantime, Ameritech

has filed tariffs and entered into agreements to defer collection of charges from all requesting telecommunications carriers for the incremental costs of interim number portability and has requested expedited proceedings before the MPSC to determine a method of interim cost recovery. Ameritech also proposes that all incumbent and new LECs keep track of their costs of providing number portability. When the MPSC approves interim recovery measures, Ameritech will comply with those measures.

133. Ameritech is currently furnishing Brooks Fiber and MFS with interim number portability for their customers. As of November 1996, more than 19,000 numbers have been ported in Michigan. Implementation of long-term number portability is scheduled to begin in Michigan in the fourth quarter of 1997.

XII. CHECKLIST ITEM (xii): LOCAL DIALING PARITY

134. Checklist Item (xii) requires that Ameritech provide "[n]ondiscriminatory access to such services or information as are necessary to allow the requesting carrier to implement local dialing parity in accordance with the requirements of Section 251(b)(3)." 47 U.S.C. § 271(c)(2)(B)(xii). Section 251(b)(3), in turn, imposes on all LECs the duty to permit all other providers of telephone exchange service and telephone toll service with "nondiscriminatory access to telephone numbers, operator services, directory assistance, and directory listing, with no unreasonable dialing delays." Ameritech meets both of these requirements.

135. The FCC's Rules (§ 51.207) specify that local dialing parity means that telephone exchange service customers within a local calling area may dial the same number of digits to make a local telephone call notwithstanding the identity of the customer's or called party's provider. Ameritech's end office integration arrangements fully meet this requirement. See AT&T Art. XIV. As recognized by the FCC in its Second Report and Order (§ 71), local dialing parity is also achieved through the implementation of the interconnection, number portability and nondiscriminatory access to telephone number requirements of Section 251 of the Act. As described earlier, Ameritech has implemented each of these in accordance with the Act and the FCC's Rules.
136. Under Ameritech's end office integration arrangements, competing providers of basic local exchange service have the ability to route automatically, without the use of any access codes or additional digits, their local telecommunications calls to Ameritech local exchange customers. Ameritech has the corresponding capability regarding its customers. These interconnection arrangements provide local dialing parity and are available to all requesting telecommunications carriers on a nondiscriminatory basis.
137. Compliance with the local dialing parity requirements can best be assessed from the perspective of a customer of a competing provider of local exchange service. As a result of the integration arrangements between Ameritech and, for example, Brooks Fiber, a customer who has subscribed to local exchange service from Brooks Fiber in Grand

Rapids can make a local call to a local exchange customer of Ameritech within the same local calling area without dialing any extra digits or access codes as compared to a call made between two similarly located Brooks Fiber end users or between two Ameritech users. In other words, as a result of the services and information provided by Ameritech and, correspondingly, the services and information provided by Brooks Fiber, the same seven-digit dialing pattern for local calls applies between customers of competing providers in the same manner as it applies between customers of the same provider.

138. Although Ameritech has no control over, or involvement in, the nature of the connection between an end user customer and the dial tone provided to that customer by its local exchange company, once a call from a competing provider's network reaches Ameritech's network, there is no unreasonable dialing delay in completing the call *vis á vis* a comparable call completed within Ameritech's network. Thus, when a Brooks Fiber local exchange customer makes a local call to an Ameritech customer, to the extent that call is handled on the Ameritech network, there is no unreasonable dialing delay as compared to a comparable call between two customers who are both on Ameritech's network. Simply stated, the call originating from a competitor's network is treated the same as a call originating from within Ameritech's network, because the network does not distinguish between such calls. Mr. Kocher discusses the issue of nondiscriminatory handling of calls in Ameritech's public switched network in his affidavit.

139. Ameritech's local dialing parity arrangement is outlined in the AT&T Agreement (Art. XIV), the Brooks Fiber Agreement (§ 14.0), the MFS Agreement (§ 14.0) and the TCG Agreement (§ 14.0).
140. Ameritech is currently furnishing the information necessary to implement local dialing parity to all requesting carriers, including Brooks Fiber, MCI Metro, MFS and MFS. In September 1996, Ameritech completed more than 35.4 million minutes of inter-network calls with full dialing parity.
141. **Toll dialing parity.** Although toll dialing parity is not a Checklist requirement and is not required until Ameritech begins providing in-region intraLATA service, Ameritech is providing intraLATA toll dialing parity in 116 exchanges, representing 50% of the access lines in its exchange service territory. Upon the filing of this application, Ameritech implemented toll dialing parity in an additional 70 exchanges, representing an aggregate total of 70% of Ameritech's access lines in Michigan. Ameritech has developed and implemented carrier-neutral operational, administrative and other processes to implement customer selection of another intraLATA toll carrier and to provide intraLATA toll dialing parity. These processes are modeled after the existing interLATA equal access order processes and include timely notifications to carriers and end user customers.

142. This implementation is being made pursuant to an IntraLATA Toll Dialing Parity Implementation Plan filed with the MPSC on November 2, 1996 for which MPSC approval has been sought. The plan calls for implementation for 100% of lines ten days prior to exercising interLATA authority. Ameritech's tariff and implementation plan fully meets the intraLATA toll dialing parity requirements of the Act.
143. In situations where LATA boundaries encompass parts of adjacent states, Ameritech will implement intraLATA toll dialing parity for affected customers in Michigan pursuant to the procedures described in appropriate tariffs filed with the FCC, coincident with Ameritech's exercise of interLATA authority granted by the FCC. This process is consistent with the FCC's Second Report and Order, ¶ 41.

XIII. CHECKLIST ITEM (xiii): RECIPROCAL COMPENSATION

144. Reciprocal compensation is a billing arrangement through which two carriers recover their costs incurred in transporting and terminating local calls that originate on the other's network. The Act and Rules require incumbent LECs and interconnecting telecommunications carriers to establish arrangements for reciprocal compensation. 47 U.S.C. §§ 251(b)(5), 252(d)(2); 47 C.F.R. § 51.703. Ameritech's reciprocal compensation terms comply with § 252(d)(2) and the FCC's Rules and thereby satisfy the Checklist.

145. Ameritech provides reciprocal compensation rates for both tandem office-based and end office-based transport and termination of local traffic originating on the other carrier's network. Brooks Fiber § 5.0; MFS § 5.0; TCG § 5.0; AT&T § 4.7.
146. Ameritech is currently furnishing reciprocal compensation to Brooks Fiber and MFS under their Agreements. A substantial amount of traffic is now being exchanged between Ameritech and other carriers. Indeed, in September 1996, Ameritech furnished reciprocal compensation for 35.4 million minutes of incoming and outgoing calls.

XIV. CHECKLIST ITEM (xiv): RESALE

147. The Checklist requires each BOC to demonstrate that its telecommunications services provided at retail are "available for resale in accordance with the requirements of sections 251(c)(4) and 252(d)(3)." 47 U.S.C. § 271(c)(2)(B)(xiv). Section 251(c)(4), in turn, requires incumbent LECs to "offer for resale at wholesale rates any telecommunications service that the carrier provides at retail to subscribers who are not telecommunications carriers" and not to prohibit or impose unreasonable or discriminatory conditions on resale of such services. Ameritech's agreements fully satisfy these requirements by making available to resellers the "Wholesale Resale Services" described in the AT&T Agreement (Art. X), the Brooks Fiber Agreement (§ 10.0) and the MFS Agreement (§ 10.0). These services include all retail telecommunications services provided by Ameritech that are subject to the resale obligation under the FCC's Rules. Further, each

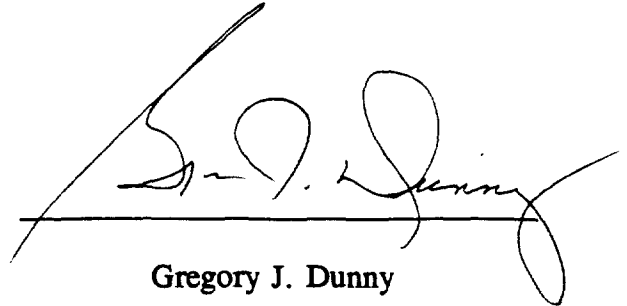
of the limitations on resale included in the Agreements (e.g., that for grandfathered services) is authorized by the Act and Rules. See 47 C.F.R. §§ 51.613, 51.615.

148. Ameritech is currently furnishing resale services to MFS and others. U.S. Network has also entered an agreement with Ameritech to resell 100,000 Ameritech Michigan lines over the next ten years. As of October 1996, approximately 12,500 resold Centrex lines were in service in Michigan, including lines resold by telemanagement firms.

CONCLUSION

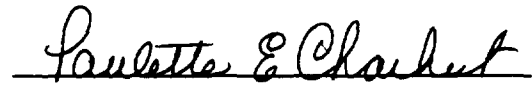
149. As explained herein, Ameritech's provision of products, services and unbundled network elements through its Brooks Fiber, MFS, TCG and AT&T Agreements satisfies each element of the Act's Competitive Checklist. Further, Ameritech is either actually furnishing or otherwise providing every Checklist Item to these carriers in full compliance with §§ 251 and 252 and the FCC's Rules. In short, Ameritech has done everything it can do to open the local exchange marketplace in Michigan to competition. Having done so, and having taken steps to ensure that the local marketplace will remain open, Ameritech is now qualified to begin providing in-region interLATA service in Michigan, as Congress contemplated and as § 271 allows. This concludes my affidavit.

I hereby swear, under penalty of perjury, that the foregoing is true and correct, to the best of my knowledge and belief.


Gregory J. Dunny

Subscribed and sworn before me this 30 of December, 1996.




Notary Public

My Commission expires: 7-13-2000

**AFFIDAVIT OF
GREGORY J. DUNNY**

SCHEDULE 1

Evaluation of Ameritech's Interconnection Agreements Michigan

The attached matrix provides a "roadmap" to Ameritech's interconnection agreements and the provisions of those agreements that satisfy each requirement of the competitive checklist. The matrix is organized as follows:

The initial Column lists, on an item-by-item basis, the requirements that must be met to satisfy the competitive checklist, with citations to the relevant section(s) of the Act and/or the FCC's rules. Columns 1-3 indicate how Ameritech Michigan satisfies each requirement, as explained below.

Column 1 indicates whether an item is currently offered by Ameritech Michigan in an approved interconnection agreement. Items that are not specifically provided for in the agreements with MFS Intelenet of Michigan, Inc. ("MFS"), Brooks Fiber Communications of Michigan, Inc. ("Brooks Fiber") or TCG Detroit ("TCG") are available on the terms and conditions included in Ameritech Michigan's interconnection agreement with AT&T Communications of Michigan ("AT&T") through the "most favored nation" ("MFN") clauses in the MFS, Brooks Fiber, and TCG agreements. The MFN clause for MFS is § 28.14, for TCG is § 28.13 and for Brooks Fiber is § 28.15. For MFS, Brooks Fiber, and TCG items which are available only via the MFN clause are those for which no entry is found in column 3 for the company in question.

Column 2 indicates those items that are currently being furnished to and paid for by MFS, Brooks Fiber, and TCG. A "Yes" applies to all three companies unless otherwise indicated. AT&T is not currently furnished with any checklist items.

Column 3 indicates the sections and schedules in the AT&T, MFS, Brooks Fiber, and TCG agreements that satisfy the requirements of the competitive checklist and the FCC's Rules regarding those items.

**Evaluation of Ameritech's Interconnection Agreements
Michigan**

	1	2	3			
			AT&T	Brooks Fiber	MFS	TCG
I. Interconnection (Checklist Item (i))	Yes	Yes	AT&T Art. III	Brooks § 4.0	MFS §§ 4.0	TCG § 4.0
A. Transmission and routing of exchange and exchange access service (Act, § 251(c)(2)(A))	Yes	Yes	AT&T Arts. IV, V	Brooks §§ 5.0, 6.0	MFS §§ 5.0, 6.0	TCG §§ 5.0, 6.0
B. At any technically feasible point (Act, § 251(c)(2)(B))	Yes	Yes	AT&T § 3.2	Brooks § 4.2.1	MFS § 4.1	TCG §§ 4.1, 4.2
1. Line side of local switch (47 CFR § 51.305(a)(2))	Yes		AT&T § 3.2.2			
2. Trunk side of local switch (<u>Id.</u>)	Yes	Yes	AT&T § 3.2.2			
3. Trunk connection points of a tandem (<u>Id.</u>)	Yes	Yes	AT&T § 3.2.2			
4. Central office cross connect points (<u>Id.</u>)	Yes		AT&T § 3.2.2			
5. Out-of-band signaling transfer points necessary to exchange traffic and access call related databases (<u>Id.</u>)	Yes		AT&T § 3.2.2			
6. Points of access to unbundled network elements (<u>Id.</u>)	Yes	Yes	AT&T § 3.2.2			
C. Access that is equal in quality to what Ameritech provides itself or any subsidiary, affiliate, or other party (Act, § 251(a)(2)(C))	Yes	Yes	AT&T §§ 3.6, 3.8, Sch. 3.8	Brooks § 4.2.1	MFS § 4.1	TCG § 4.2
1. That meets the same technical criteria and standards used in Ameritech's network (47 CFR § 51.305(a)(3))	Yes	Yes	AT&T § 3.6			TCG § 4.2
2. Upon request, that is superior or inferior to access provided to other carriers (47 CFR § 51.305(a)(4))	Yes		AT&T § 3.6			TCG § 4.2

**Evaluation of Ameritech's Interconnection Agreements
Michigan**

	1	2	3			
			AT&T	Brooks Fiber	MFS	TCG
D. On rates, terms, and conditions that are just, reasonable, and nondiscriminatory and are no less favorable than the terms and conditions Ameritech applies to itself (Act, §§ 251(c)(2)(D), 252(d)(1), 47 CFR § 51.305(a)(5))	Yes	Yes	AT&T § 3.6, AT&T Pricing Sch., Item VIII	Brooks § 4.2.1	MFS § 4.1	TCG § 4.2
E. Two-way trunking upon request and as technically feasible (47 CFR § 51.305(f))	Yes		AT&T § 4.3	Brooks §§ 5.3, 6.2	MFS §§ 5.3, 6.2	TCG §§ 5.2, 6.2
F. Through any interconnection method to which the parties may agree, consistent with the Act (47 CFR § 51.321(a))	Yes		AT&T § 3.2.2	Brooks § 4.2.2		TCG § 4.2.2
1. Physical collocation (Act, § 251(c)(6); 47 CFR § 51.321(b)(1))	Yes		AT&T § 12.1	Brooks §§ 4.2.2, 12.0	MFS § 12.1	TCG § 12.1
2. Virtual collocation (Act, § 251(c)(6); 47 CFR § 51.321(b)(2))	Yes	Yes	AT&T §§ 12.2, 12.3, Sch. 12.12	Brooks §§ 12.1, 12.3, 12.4	MFS §§ 12.1, 12.3, 12.4	TCG §§ 12.1, 12.3, 12.4
a. For any type of equipment used for interconnection or access to unbundled network elements, including optical terminating equipment and multiplexers and equipment being collocated to terminate basic transmission facilities (47 CFR § 51.323(b))	Yes	Yes	AT&T §§ 12.1, 12.5			TCG § 12.5
b. Allow requesting carrier to connect collocated equipment to Ameritech's unbundled network elements (47 CFR § 51.323(g))	Yes	Yes	AT&T §§ 12.1, 12.5			TCG §§ 12.1, 12.5
c. Permit two collocating carriers to interconnect equipment at Ameritech's premises (47 CFR § 51.323(h))	Yes	Yes	AT&T §§ 12.1, 12.5			TCG § 12.7

**Evaluation of Ameritech's Interconnection Agreements
Michigan**

	1	2	3			
			AT&T	Brooks Fiber	MFS	TCG
d. For physical or virtual collocation, physically accessible interconnection points in accordance with 47 CFR § 51.323(d))	Yes	Yes	AT&T § 12.8.1, Sch. 12.2			
e. Ameritech shall install, maintain and repair collocated equipment in same manner as its own equipment (47 CFR § 51.323(e))	Yes	Yes	AT&T § 12.4			
f. Allocate space in accordance with 47 CFR § 51.323(f)	Yes		AT&T § 12.9, Sch. 12.9.1			
3. Meet point arrangements (47 CFR § 51.321(b)(2))	Yes		AT&T § 3.3	Brooks § 4.3	MFS § 4.2	TCG § 4.3
G. Provide technical information regarding Ameritech's facilities to allow requesting carrier to achieve interconnection (47 CFR § 51.305(f))	Yes	Yes	AT&T § 3.7	Brooks § 4.5	MFS § 4.4	TCG § 4.5
II. Unbundled Network Elements	Yes	Yes	AT&T Art. IX	Brooks § 9.0	MFS § 9.0	TCG § 9.0
A. Provide to any requesting carrier, nondiscriminatory access to network elements (Act, § 251(c)(3))	Yes	Yes	AT&T §§ 9.1.1, 9.4, 9.5	Brooks § 9.0		
1. At any technically feasible point (47 CFR § 51.307(a))	Yes	Yes	AT&T § 9.1.1	Brooks § 9.0		TCG § 9.0
2. On rates, terms, and conditions that are just, reasonable, and nondiscriminatory (<u>Id.</u>)	Yes	Yes	AT&T §§ 9.4, 9.5	Brooks § 9.0		
3. Provide technical information regarding Ameritech's facilities to enable requesting carrier to achieve access to elements (47 CFR 51.307(e))	Yes	Yes	AT&T §§ 9.4, 9.5, Sch. 9.5, § 1.0	Brooks § 9.1		
B. Provide network elements in a manner that allows requesting carrier to provide any telecommunications service that may be offered by means of that element (47 CFR § 51.307(c))	Yes	Yes	AT&T § 9.1.1	Brooks § 9.0		TCG § 9.5

**Evaluation of Ameritech's Interconnection Agreements
Michigan**

	1	2	3			
			AT&T	Brooks Fiber	MFS	TCG
C. Access to the facility or functionality of a network element provided separately from access to other elements, and for a separate charge (47 CFR § 51.307(d))	Yes	Yes	AT&T §§ 9.2, 9.3.2			TCG § 9.5
D. No limitations, restrictions, or requirements on requests for or use of unbundled network elements that would impair a requesting carrier's ability to provide a telecommunications service in the manner it intends (47 CFR § 51.309(a))	Yes	Yes	AT&T § 9.1.1			
E. A requesting carrier may purchase an unbundled network element to provide exchange access services to itself (47 CFR § 51.309(b))	Yes		AT&T §§ 9.1.1, 9.3.1, 9.3.3			
F. A requesting carrier is entitled to exclusive use of an unbundled network facility for a period of time, and to use of an unbundled feature, function, or capability for a period of time (47 CFR § 51.309(c))	Yes	Yes	AT&T §§ 9.1.1, 9.3.1, 9.3.3			
G. Ameritech retains duty to maintain, repair, or replace the unbundled network element (<u>Id.</u>)	Yes	Yes	AT&T § 9.9			
H. Where technically feasible, quality of the unbundled element itself and access to the element must be at least equal in quality to what Ameritech provides itself or any subsidiary, affiliate, or other party (47 CFR § 51.311(a),(b); 47 CFR § 51.313(a), (b))	Yes	Yes	AT&T §§ 9.4, 9.6, 9.10, Sch. 9.10			
I. Requesting carrier also may obtain service that is superior or inferior to what Ameritech provides itself, upon request (47 CFR § 51.311(c))	Yes		AT&T § 9.6			

**Evaluation of Ameritech's Interconnection Agreements
Michigan**

	1	2	3			
			AT&T	Brooks Fiber	MFS	TCG
J. All required OSS functions made available to purchasers of unbundled elements (47 CFR § 51.313(c))	Yes	Yes	AT&T § 9.5.2			
K. Pricing in accord with § 252(d)(1)	Yes	Yes	AT&T Pricing Sch., Item V	Brooks Pricing Sch., Item IV	MFS Pricing Sch., Item IV	TCG Pricing Sch., Item IV
Combinations of Unbundled Elements (47 CFR § 51.315)						
A. Unbundled elements provided in a manner that allows requesting carriers to combine such elements to provide a telecommunications service (47 CFR § 51.315(a))	Yes		AT&T § 9.3	Brooks §§ 9.0, 9.5.2	MFS § 9.5.2	TCG § 9.5.2
B. Requested network elements that Ameritech currently combines will only be separated upon request (47 CFR § 51.315(b))	Yes		AT&T § 9.3.2			
C. Ameritech will perform functions necessary to combine requested network elements where technically feasible and where such combination will not impair the ability of other carriers to access unbundled elements or interconnect with Ameritech (47 CFR § 51.315(c))	Yes		AT&T § 9.3.3			
D. Ameritech will combine network elements with elements possessed by requesting carrier, where technically feasible (47 CFR § 51.315(d))	Yes		AT&T §§ 9.3.6, 9.6			